

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE: :  
Heather A. Halldin : Chapter 13  
: No.: 21-10176-AMC  
Debtor(s) :  
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RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC  
STAY FILED BY WILMINGTON TRUST, N.A.

Debtor, Heather A. Halldin, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by Wilmington Trust, N.A. hereby submits the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Debtor is unsure of the same.
9. Denied.
10. Denied.
11. Denied.
12. Denied.

WHEREFORE, based on the aforementioned, Movant shall be denied an Order modifying the Automatic Stay under Bankruptcy Code Section 362.

Respectfully submitted,

Dated: May 28, 2021

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/s/ Brad J. Sadek, Esq.  
Attorney for the Debtor  
Sadek & Cooper  
1315 Walnut Street, #502  
Philadelphia, PA 19107  
(215) 545-0008

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CERTIFICATE OF SERVICE

I Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

**William C. Miller, Esq.**  
Chapter 13 Trustee

**Rebecca A. Solarz**  
Electronic Notice  
Attorney for Movant

Dated: May 28, 2021

/s/Brad J. Sadek, Esq.  
Brad J. Sadek, Esq.  
Attorney for Debtor  
1315 Walnut Street  
Suite #502  
Philadelphia, PA 19107